

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DCC #:
DATE FILED: 7/28/15

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> HANLY CONROY BIERSTEIN SHERIDAN FISHER & HAYES LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

Via Facsimile

July 28, 2015

The Honorable Frank Maas
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 740
New York, NY 10007

MEMO ENDORSED

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

The Plaintiffs' Executive Committee write to request brief extension of the deadline to submit plaintiffs' motions to compel as to defendants Soliman al-Buthe, Pirouz Sedaghaty, and Wa'el Jelaidan, currently set for July 30, 2015. *See* June 16, 2015 Order (ECF No. 2963). We request an extension until Monday, August 10, 2015. We would also request that the dates for any responses or replies to these applications be similarly extended. The motions are being coordinated among the counsel preparing to attend the hearing in this matter on July 30, 2015. Plaintiffs' efforts to coordinate the briefing and filing of the motions are complicated by the fact that they coincide with the preparation, travel, and attendance at the hearing, followed by additional commitments by some counsel the first week of August. Plaintiffs have conferred with counsel for each of the defendants and they do not object to the extension.

Plaintiffs thank Your Honor in advance for the Court's consideration of this request.

Respectfully submitted,



Robert T. Haefele
THE MDL 1570 PLAINTIFFS' EXECUTIVE
COMMITTEES

cc: The Honorable George B. Daniels (via USPS)
MDL-1570 Counsel of Record (via email)

*Approved
Maas, C. 7/28/15*